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Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No.: 4:22-md-03047-YGR

This Document Relates To:

**TEMPORARY SEALING MOTION RE
DEFENDANTS' MOTION TO EXCLUDE
GENERAL CAUSATION TESTIMONY
OF PLAINTIFFS' EXPERTS**

ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Defendants submit this Temporary Sealing Motion regarding Defendants' Motion to Exclude General Causation Testimony Plaintiffs' Experts. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Whether document contains a Party's Confidential Information
ECF No. 2298-6	May 16, 2025 MDL Expert Report of Dimitri Christakis.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-12	September 11, 2025 Deposition of Dimitri Christakis.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-15	June 25-26, 2025 JCCP Deposition of Dimitri Christakis	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-17	July 30, 2025 Expert Rebuttal Report of Dimitri Christakis.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-18	Expert Report of Drew P. Cingel Ph.D.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-19	July 9, 2025 Deposition Transcript of Drew Cingel.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-22	July 9, 2025 Expert Report of Douglas Tucker, M.D	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-23	JCCP Deposition Transcript of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated June 4-5, 2025.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2298-24	July 30, 2025 Expert Report of Gary Goldfield.	Temporarily filing under seal because document contains information that the parties may consider to be confidential

1	ECF No. 2298-25	Transcript of the deposition of Gary Goldfield taken on July 10-11, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
2	ECF No. 2298-26	Transcript of the deposition of Gary Goldfield taken on September 10, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
3	ECF No. 2298-27	Errata sheet of the deposition of Gary Goldfield taken on July 11, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	ECF No. 2298-30	May 16, 2025 Expert Report of Anna Lembke.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
5	ECF No. 2298-31	June 18, 2025 Deposition Transcript of Anna Lembke.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
6	ECF No. 2298-32	July 30, 2025 Expert Rebuttal Report of Anna Lembke.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	ECF No. 2298-33	August 27, 2025 Deposition Transcript of Anna Lembke.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
8	ECF No. 2298-34	MDL Amended Expert Report of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated May 16, 2025.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
9	ECF No. 2298-35	JCCP Expert Report of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated April 18, 2025.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	ECF No. 2298-40	Exhibit 9, a collection of quotations from 26 cross-sectional studies cited by Dr. Mojtabai, to the JCCP deposition of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated June 4, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
11	ECF No. 2298-41	MDL Deposition Transcript of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated August 12, 2025.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
12	ECF No. 2298-42	Expert Report of Dr. Stuart Murray, MSc., DClinPsych, Ph.D., dated May 16, 2025	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
1	ECF No. 2298-43	JCCP Deposition Transcript of Dr. Stuart Murray MSc., DClinPsych, Ph.D., dated June 19, 2025.
2	ECF No. 2298-44	MDL Deposition Transcript of Dr. Stuart Murray MSc., DClinPsych, Ph.D., dated August 25, 2025.
3	ECF No. 2298-50	Expert Rebuttal Report of Dr. Stuart Murray, MSc., DClinPsych, Ph.D., dated July 30, 2025.
4	ECF No. 2298-56	May 16, 2025 Expert Report of Eva Telzer.
5	ECF No. 2298-57	June 12-13, 2025 JCCP Deposition Transcript of Eva Telzer.
6	ECF No. 2298-58	MDL Deposition Transcript of Eva Telzer.
7	ECF No. 2298-65	July 30, 2025 Expert Rebuttal Report of Eva Telzer.
8	ECF No. 2298-71	MDL PI/SD Expert Report of Dr. Jean Twenge, Ph.D., dated May 16, 2025.
9	ECF No. 2298-72	MDL AG expert report of Dr. Jean Twenge, Ph.D., dated May 16, 2025.
10	ECF No. 2298-73	MDL Deposition Transcript of Dr. Jean Twenge, Ph.D., dated September 17-18, 2025.
11	ECF No. 2298-74	JCCP Deposition Transcript of Dr. Jean Twenge, Ph.D., dated June 26, 2025.
12		Temporarily filing under seal because document contains information that the parties may consider to be confidential
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1	ECF No. 2298-78	Rebuttal Expert Report of Dr. Jean Twenge, Ph.D., dated July 30, 2025.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
2	ECF No. 2298-79	August 12-13, 2025 Deposition Transcript of Dr. Sharon A. Hoover, Ph.D.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
3	ECF No. 2298-80	May 16, 2025 Expert Report of Dr. Sharon A. Hoover, Ph.D.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	ECF No. 2298-81	August 1, 2025 Rebuttal Report of Dr. Sharon A. Hoover, Ph.D. for Tucson Unified School District.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
5	ECF No. 2298-88	JCCP Deposition Transcript of Arturo Béjar.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
6	ECF No. 2298-89	MDL Deposition Transcript of Arturo Béjar.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	ECF No. 2298-90	MDL Deposition Transcript of Lotte Rubaek.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
8	ECF No. 2298-91	JCCP Deposition Transcript of Lotte Rubaek.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
9	ECF No. 2298-92	July 30, 2025 Rebuttal Trial Report of Dr. Lauren Hale.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	ECF No. 2298-93	Deposition Transcript of Dr. Lauren Hale.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
11	ECF No. 2298-96	May 16, 2025 Expert Report of Bradley Zicherman.	Temporarily filing under seal because document contains information that the parties may consider to be confidential
12	ECF No. 2298-97	July 30, 2025 Expert Rebuttal Report of Dr. Bradley Zicherman.	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
ECF No. 2298-98	Deposition Transcript of Dr. Bradley Zicherman.	Temporarily filing under seal because document contains information that the parties may consider to be confidential

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DATED: September 30, 20258
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10 Respectfully submitted,11 By: /s/ Ashley M. Simonsen12 Ashley M. Simonsen (Bar No. 275203)
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25 Facebook Technologies, LLC; Instagram,
26 LLC; and Siculus LLC f/k/a Siculus, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing and its attachments will be served electronically on counsel for Plaintiffs to the email addresses that were designated by counsel for that purpose.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on September 30, 2025.

/s/ *Ashley M. Simonsen*

Ashley M Simonsen